

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



September 14, 2006

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at the National Space Club's 25th Annual Reception Honoring Goddard Space Flight Center's Procurement Organization

On October 17, 2006, the National Space Club will host and sponsor its 25th Annual Reception at NASA's Goddard Space Flight Center Visitors Center. The National Space Club was founded in 1957 to stimulate the exchange of ideas and information about rocketry and astronautics and to promote the recognition of America's achievements in aerospace. The Club is a nonprofit corporation composed of representatives of industry, government, educational institutions and private individuals. The purpose of the event is to recognize the efforts of the Goddard Space Flight Center Procurement Organization. It has been determined to be in the best interest of the Government for those NASA employees who are invited to this event to attend in their official capacities and as representatives of NASA.

Approximately 300 guests from other Federal agencies, industry and academia have been invited to the reception. The estimated cost for the reception, including food and beverages is \$80 per person. The event will allow NASA employees an opportunity to discuss with other attendees issues of interest to the procurement community. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Accordingly, NASA invitees may attend the event without charge.

A blue ink signature of R. Andrew Falcon, written in a cursive style.

R. Andrew Falcon